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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ERICA FRASCO, individually and on behalf of all others similarly situated,

Plaintiff,

V.

FLO HEALTH, INC., GOOGLE, LLC,
FACEBOOK, INC., APPSFLYER, INC., and
FLURRY, INC..

Defendants.

Case No.: 3:21-cv-00757-JD

**DECLARATION OF
CAROL C. VILLEGRAS**

Judge: Hon. James Donato
Hearing: February 10, 2022
Time: 10:00 a.m.
Place: Courtroom 11, 19th Floor
450 Golden Gate Ave
San Francisco, CA 94102
Date Filed: December 16, 2021

1 SARAH WELLMAN, individually and on behalf
2 of all others similarly situated,

3 Plaintiff,
4

5 v.

6 FLO HEALTH, INC., GOOGLE, LLC,
7 FACEBOOK, INC., APPSFLYER, INC., and
FLURRY, INC.,

8 Defendants.
9

10 JUSTINE PIETRZYK, individually and on
behalf of all others similarly situated,

11 Plaintiff,
12

v.

13 FLO HEALTH, INC., GOOGLE, LLC,
14 FACEBOOK, INC., APPSFLYER, INC., and
FLURRY, INC.,

15 Defendants.
16

17 JENNIFER CHEN, individually and on behalf of
all others similarly situated,

18 Plaintiff,
19

v.

20 FLO HEALTH, INC., GOOGLE, LLC,
21 FACEBOOK, INC., APPSFLYER, INC., and
FLURRY, INC.,

22 Defendants.
23

1
2 TESHA GAMINO, individually and on behalf of
3 all others similarly situated,

4 Plaintiff,
5
6 v.
7
8 FLO HEALTH, INC., GOOGLE, LLC,
9 FACEBOOK, INC., APPSFLYER, INC., and
10 FLURRY, INC.,
11
12 Defendants.

9 LEAH RIDGWAY and AUTUMN MEIGS,
10 individually and on behalf of all others similarly
11 situated,
12
13 Plaintiff,
14
15 v.
16 FLO HEALTH, INC., GOOGLE, LLC,
17 FACEBOOK, INC., APPSFLYER, INC., and
18 FLURRY, INC.,
19
20 Defendants.

17 MADELINE KISS, individually and on behalf of
18 all others similarly situated,
19
20 Plaintiff,
21
22 v.
23 FLO HEALTH, INC., GOOGLE, LLC,
24 FACEBOOK, INC., APPSFLYER, INC., and
25 FLURRY, INC.,
26
27 Defendants.

I, Carol C. Villegas, declare:

1. I am an attorney in good standing admitted pro hac vice before the Court for this action. I am a partner at Labaton Sucharow LLP and together with counsel at Lowey Dannenberg, P.C. and Spector Roseman & Kodroff, P.C. represent the Plaintiffs as Interim Co-Lead Counsel in the class action captioned *Frasco et al., v. Flo Health, Inc. et al.*, No. 3:21-cv-00757-JD.

2. Attached hereto as Exhibit A is a true and correct copy of the Federal Trade Commission Complaint against Flo Health, Inc. for violation of provisions of the Federal Trade Commission Act.

3. Attached hereto as Exhibit B is a true and correct copy of the New York State Department of Financial Services Report on Investigation of Facebook Inc. Data Privacy Concerns, dated February 18, 2021.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on this 16th day of December 2021.

/s/ Carol C. Villegas
Carol C. Villegas